



# Written Standards

**Merced City & County  
Continuum of Care  
CA-520**

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## Introduction

The Continuum of Care (CoC) is the organization responsible for coordinating and implementing a system to meet the needs of populations and subpopulations experiencing homelessness within a given geographic area. The CoC designated as CA-520 contains the geographical areas of Merced City and County.

The Emergency Solution Grant (ESG) Interim Rule as well as the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care (CoC) Program Interim Rules state that the CoC, in consultation with recipients of ESG program funds within the geographic area, are responsible for the following activities:

- Establish and consistently follow written standards for providing Continuum of Care assistance.
- Establish performance targets appropriate for population and program type.
- Monitor recipient and sub recipient performance.

These written standards have been established to ensure that persons experiencing homelessness who enter programs throughout the CoC will be given similar information and support to access and maintain permanent housing. All Homeless Programs (Programs), also referred to as Homeless Service Providers (Providers) or Subrecipients, that receive ESG or CoC funding are required to abide by these written standards. Programmatic procedures should reflect the policy and procedures described within this document. The CoC strongly encourages Programs or Providers that do not receive either of these funding sources to accept and utilize these written standards.

The majority of these standards are based on the ESG and/or HEARTH Interim Rules. There are additional standards that have been established by the CoC to assist programs in meeting or exceeding performance outcomes and to help reach the goal of ending homelessness.

The Continuum of Care Written Standards will include, but is not limited to, policies and procedures for the following:

- Evaluating individuals' and families' eligibility for assistance.
- Determining and prioritizing which eligible households will receive Transitional Housing (TH), Safe Haven and Permanent Supportive Housing (PSH), and Rapid Re-Housing (RRH) funded by the CoC and ESG.
- Standards for determining what percentage and amount of rent each household must pay while receiving RRH assistance.
- Common performance measurements and benchmarks.
- Street Outreach
- Homelessness Prevention
- Rapid Re-Rehousing
- Emergency Shelter

These standards are in place to:

- Establish community-wide expectations on the operations of projects within the community.
- Ensure that the system is transparent to users and operators.
- Establish a minimum set of standards and expectations for the quality of projects.
- Ensure local priorities are transparent to recipients and subrecipients of funding.

- Create consistency and coordination between recipients' and subrecipients' projects.

These written standards have been developed in conjunction with ESG recipients and service providers. Therefore, this document reflects the perspectives of organizations that are directly providing homeless housing and homeless services. This includes Emergency Shelter (ES), Transitional Housing (TH), Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH), and Supportive Service Only (SSO).

The CoC Written Standards have been approved by the CoC, the CoC Board, the County, the City, ESG recipients, and ESG providers. The written standards will be reviewed and revised as needed at a minimum of once annually. To participate in the process for acquiring CoC or ESG funding, agreement to abide by these Written Standards is required.

## **Requirements for All Programs**

### **Policies & Procedures**

All ESG and CoC funding programs are required to develop, implement, and maintain written policies and procedures that fully detail their operations for all program types. These policies and procedures must be in alignment with these Written Standards. Instances where there are conflicts between the programs' policies and procedures and the CoC's written standards, the written standards shall prevail.

### **Evaluations**

All ESG and CoC funded programs are required to conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under [§ 576.400\(d\)](#) and these written standards.

### **Homeless Status Verification**

All programs must require documentation at intake of the evidence relied upon to establish and verify homeless status. The priority for obtaining evidence of homeless status shall be third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained within HMIS are acceptable evidence of third-party documentation and intake worker observations if HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

For additional information on qualifying sources of documentation for the verification of homeless status, refer to Homeless Status under [24 CFR 576.500 \(b\)](#) Recordkeeping and Reporting Requirements.

### **Housing First & Low Barriers**

The Housing First approach is an evidence-based, client-centered practice for serving individuals experiencing homelessness. This approach operates under the premise that establishing housing is a necessary precursor to making other voluntary life changes, such as seeking treatment or medical care. Therefore, priority is placed on providing housing to individuals and families quickly with as few obstacles or barriers as possible.

The Housing First approach has several key features: maintaining minimal programmatic prerequisites, admission policies that support low barriers to access, rapid and streamlined entry into permanent housing, voluntary and engaging supportive services, and a focus on housing stability. As such, CoC funded projects should allow entry to program participants regardless of their income, current or past substance use, criminal records, or history of domestic violence. Programs also should not terminate clients regardless of whether or not they participate in supportive services, make progress on a service plan, lose their income, or based on other activities not covered in a lease agreement typically found for an unassisted person in the program's geographic area. All CoC funded programs must adopt the Housing First and Low Barriers approach. The CoC will authorize limited exceptions to the adoption of a housing first model for situations where it conflicts with funder requirements or local/state law (e.g., restrictions on serving people who are listed on sex offender registries).

### **Program Access**

Admission to the program will not be contingent upon pre-requisites such as abstinence of substances, minimum income requirements, health or mental health history, medication adherence, age, criminal justice history, financial history, completion of treatment, participation in services, "housing readiness", history or occurrence of victimization, survivor of sexual assault or an affiliated person of such a survivor or other unnecessary conditions unless required by law or funding source.

Procedures and oversight must demonstrate that staff do everything possible to avoid denying assistance or rejecting an individual or family for the reasons previously listed.

Equal access shall be provided in accordance with the 2012 and 2016 Equal Access Rules, meaning that any project funded by HUD must ensure equal access for persons regardless of one's sexual orientation or marital status, and in accordance with one's gender identity. Adult households, regardless of marital status, should have equal access to the program.

Providers shall have an expedited admissions process, to the greatest extent possible, including helping participants obtain documentation required by funding sources, as well as processes to admit participants regardless of the status of their eligibility documentation whenever possible.

Intake and assessment procedures will be focused on the individual's or family's strengths, needs, and preferences. Programs should not require specific appointment times but have flexible intake schedules that ensure access to all households. Assessments are focused on identifying barriers to housing that can inform the basis of a housing plan as soon as a person is enrolled in the program.

Providers shall actively participate in the Merced CoC's Coordinated Entry process as a part of a streamlined community-wide system access triage. Referrals from Coordinated Entry must be rarely rejected, and only if there is a history of violence, the participant does not want to be in the program, there are legally valid grounds (such as restrictions regarding sex offender) or some other exceptional circumstance that is well documents.

For programs that can no longer serve particular households, the Provider shall utilize the Coordinated Entry process to ensure that those individuals and families have access to other housing and services as desired, and do not become disconnected from services and housing. Households that encounter exits under these circumstances, such as if they demonstrate violent or harassing behaviors, are to be described with the Provider's regulation adherent policies.

### **Communication**



To ensure proper communication with program recipients, Providers shall take appropriate steps to ensure effective communication with applicants, beneficiaries, and members of the public.

In accordance with [24 CFR 8.6](#), Programs shall furnish appropriate auxiliary aids where necessary to afford an individual with handicaps an equal opportunity to participate in, and enjoy the benefits of, a program or activity receiving Federal financial assistance.

- In determining what auxiliary aids are necessary, the Provider shall give primary consideration to the requests of the individual with handicaps.
- Programs are not required to provide individually prescribed devices, readers for personal use or study, or other devices of a personal nature.
- When a provider communicates with applicants and beneficiaries by telephone, telecommunication devices for deaf persons (TDD's) or equally effective communication systems shall be used.

Providers shall adopt and implement procedures to ensure that interested persons (including persons with impaired vision or hearing) can obtain information concerning the existence and location of accessible services, activities, and facilities.

Providers are not required to take any actions that would result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens. If an action would result in such an alteration or burdens, the Provider shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that, to the maximum extent possible, individuals with handicaps receive the benefits and services of the program or activity receiving HUD assistance.

## Education & Input

Program participants shall receive ongoing education on Housing First principles as well as other service models employed in the program. In the beginning of and throughout tenancy, participants are informed about their full rights and responsibilities as lease holders, including the potential causes for eviction.

Providers shall gather and welcome input regarding the program's policies, processes, procedures, and practices. Opportunities for involvement include, but are not limited to, the following:

- 1) Quality assurance and evaluation processes;
- 2) A participant leadership/advisory board;
- 3) Processes to formally communicate with landlords;
- 4) The design of and participation in surveys and focus groups;
- 5) Planning social gatherings; and
- 6) Integrating peer specialist and peer-facilitated support groups to complement professional services.

## Leases

Programs shall provide housing that is not time-limited, although rent assistance may be, and with leases are automatically renewable upon expiration, except with prior notice by either party.

Providers shall provide the participant, at minimum, choices in deciding the location and type of housing based on preference from a range of housing types and among multiple units, as available and as practical. In program-based settings, participants should be offered a choice of units within a particular

building, or within the portfolio of single site properties. In programs that use shared housing (i.e., housing with unrelated roommates), participants should be offered their choice of roommates, as available and as practical. Additionally, as applicable, participants should be able to choose their roommates when sharing a room or unit.

Leases shall not have any provisions that would not be found in leases held by any other tenant in the property or building and is renewable per the participants' and owner's choice. People experiencing homelessness who receive help moving into permanent housing should have leases that confer full rights, responsibilities, and legal protections under Federal, state, and local housing laws. For transitional housing, there may be limitations on the length of stay, but a lease/occupancy agreement should look like a lease that a person would have in the normal rental market.

Participants shall be given access to legal assistance and encouraged to exercise their full legal rights and responsibilities. Landlords and providers shall abide by their legally defined roles and responsibilities.

Property or building management, with services support, incorporates a culture of eviction avoidance, reinforced through practices and policies that prevent lease violations and evictions among participants, and evict participants only when they are a threat to themselves or others. There shall be clear eviction appeal processes and due processes for all participants. Lease bifurcation shall be allowed so that a tenant or lawful occupant who is a victim of a criminal act of physical violence committed against them by another tenant or lawful occupant is not evicted, removed, or penalized if the other is evicted.

Providers shall engage in a continued effort to hold housing for participants, even if they leave their housing for short periods due to treatment, illness, or any other temporary stay outside of the unit.

While tenants are accountable to the rental agreement, adjustments may be needed on a case-by-case basis. As necessary, participants are given special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.

## Services

Participants shall be able to choose from an array of services. Services offered are housing focused and include the following areas of support. These should be provided by linking participants to community-based services.

- 1) Employment and income;
- 2) Childhood and education;
- 3) Community connection; and
- 4) Stabilization to maintain housing.

Person-centered Planning shall be used as the leading principle of the Provider's service planning process.

Service connections should be permanently available and accessible for participants in Permanent Supportive Housing. Rapid Re-Housing programs should, at minimum, be prepared to offer services for up to 6 months after rental assistance ends. In emergency shelter and transitional housing, services are available as long as the participant resides in the unit or bed and for up to 6 months following exit from transitional housing.

Wherever possible, participants continue to be offered services even if they lose their housing unit or bed (for congregated programs), or if they are placed in short-term inpatient treatment. Ideally, the service relationship should continue, despite a service hiatus during some institutional stays.

The Provider shall provide effective services by developing relationships with participants that provide immediate needs and safety, develop trust and common ground, make warm hand-offs to other mainstream service providers, and clearly explain staff roles. Engagement shall be regular, and relationships develop over time.

Program staff shall be sensitive to and support the cultural aspects of diverse households. Whenever possible, the staff demographics should reflect the participant population they serve in order to provide appropriate, culturally specific services. The Provider shall provide translation services when needed to ensure full comprehension of the program. Programs that serve families with children should have family-friendly rules that allow for different schedules based on work and school hours and have services that allow parents to participate in activities without having to constantly supervise their children themselves (i.e., utilizing the bathroom or taking a shower without their children being in the bathroom with them).

Services support a participant's ability to obtain and retain housing regardless of changes in behavior. The Provider shall provide services that are informed by a harm-reduction philosophy, such as recognizing that substance use, and addiction is a part of some participants' lives. Participants are to be engaged in non-judgmental communication regarding their behavior and offered education regarding how to avoid risky behaviors and engage in safer practices.

## **Housing**

Participation in permanent and temporary housing settings, as well as crisis settings such as emergency shelter, is not contingent on participating in supportive services or demonstration of progress made on a service plan. The Provider shall ensure that services are offered by staff but are voluntary for participants.

The Provider shall ensure that participants are only terminated from the project for violations of the lease or occupancy agreements, as applicable. Occupancy agreements or an addendum to the lease do not include conditions around substance use or participation in services. If the program is a recovery housing model focused on people who are in early recovery from drugs or alcohol (as outlined in HUD's Recovery Housing Brief), different standards related to, and subsequent offer of treatment may apply.

The Provider shall ensure that program staff have realistic expectations and policies. That the rules and regulations are designed to support safe and stable communities and should never interfere with life in the community. Participants have access to the program at all hours (except for nightly in and out shelters) and accommodation is made for pets.

The Provider shall accommodate transfers, in accordance with the CoC's Emergency Transfer Plan (ETP) Policy on page 16, for tenants who reasonably believe that they are threatened with imminent harm from further violence if the tenant remains in the same unit. Whenever possible, transfers should occur before a participant experiences homelessness.

## **Project-Specific Standards**

Permanent supportive housing programs shall ensure quick linkage to a unit and wrap around services, based on participant needs, preferences, and resource availability.

Participants and staff shall understand that the primary goal of permanent supportive housing is to end homelessness for people with the most severe service needs and help participants stay housed, regardless of other perceived barriers.

In order to provide clear and distinct roles, the staff for participants in terms of leasing and rules enforcement as well as tenant advocacy, property management and service provider staff should have

separate roles. However, they should work together on a regular basis through regular communications and meetings regarding participants to address tenancy issues in order to preserve tenancy.

## **Targeted Populations**

### **Youth and Young Adults**

Providers shall provide services that are focused on ensuring that youth transition to independence.

Youth projects should include positive youth development orientation. Positive youth development builds on strength and resiliency. By focusing on strengths and assets, rather than what might be “wrong”, youth are empowered and are equipped to make positive decisions.

Youth models employ a harm reduction and recovery orientation, including those developed for youth and young adults with substance use and addictions. The Provider may make abstinence-based models available for youth and young adults; however, the choice should lie with the participant, and not with the program.

Providers shall ensure a developmentally appropriate project design that project entry and on-going participation is not predicated on behaviors or experiences that youth and young adults may not currently have if they were older would not result in consequence. For example, projects should accept and allow continued participation for youth who do not have income or immediate prospects of income because their age has not allowed them the opportunity to gain employment.

### **People in Recovery**

Connection to recovery housing reflects individual choice for this path towards recovery. The Provider may incorporate Abstinence-only spaces whenever possible, thus providing this type of recovery option to those who choose it. Recovery support is offered, particularly in connections to community-based treatment options.

Providers shall provide housing services that include relapse support that does not automatically evict or discharge a participant from the project for temporary relapse. Relapse support might include referrals to outpatient treatment or direct provision of outpatient services or the ability to hold a unit for a certain period of time (30-90 days) while the participant undergoes residential treatment.

Recovery housing programs shall provide services that align with participant’s choice and prioritization of recovery, including but not limited to abstinence from substances (if that is the participant’s personal goal), long-term permanent housing stability, and stable income through employment or benefits. Support is offered through connections to community-based treatment options.

### **Domestic Violence Survivors**

Led by the survivor, the Provider shall develop a safety plan that includes an assessment of danger, particular points of vulnerability, and best approaches to increasing safety.

The unique needs and strengths of each individual survivor and their children are to be considered with regard to the types of services that are available and offered. Providers shall use flexible and survivor-focused approaches to overcome barriers survivors may face in accessing services through traditional models.

Providers shall support survivors and their children to retain or obtain safe, stable housing. Survivors choose the type of housing and location of housing. Housing shall be located in an area that is considered safe from the abusive relationship.

## Equal Access & Non-discrimination

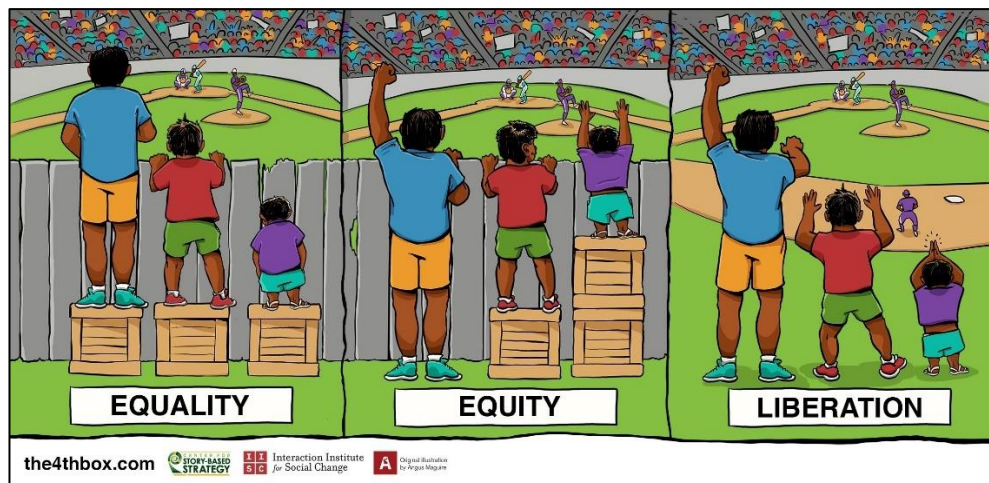
Everyone deserves the right to equal and fair treatment, and access to housing is no exception. The Fair Housing Act protects individuals from discrimination when renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities based on race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, and disability. Additionally, the Equal Access to Housing Final Rule ensures equal access to housing is given regardless of sexual orientation, gender identity, or marital status.

Providers must comply with all federal statutes and rules, including the Fair Housing Act and Equal Access to Housing Final Rule. To do so, providers must have anti-discrimination policies in place that align with these rules and statutes. In addition, providers must assertively outreach to people least likely to engage in the homeless system. A determination of eligibility for housing that is assisted by U.S. Department of Housing and Urban Development (HUD) or subject to a mortgage insured by HUD shall be made in accordance with the eligibility requirements provided for such program by HUD, and such housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.

Providers must ensure that equal access is provided to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family. In addition, providers must ensure that individuals are placed, served, and accommodated in accordance with their gender identity and are not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity. Finally, providers must also ensure that households with children under 18 are not denied admission based on the age of any child under 18.

## Racial Equity and Inclusion

Equality and equity are often used interchangeably; however, they are not synonymous. When distributing resources, equality means that each individual or group of people is given the same amount or access to resources regardless of external factors, circumstances, or outcomes. Equity, however, recognizes that each person has a different starting point or set of circumstances. Therefore, equity allocates the exact amount or type of resource that each individual or group needs to achieve a certain outcome.



Artist: Angus Maguire

Historically, the Black, Indigenous, People of Color (BIPOC) community has been overrepresented among the homeless population when compared to the U.S. population census. The CoC recognizes the need for homeless response systems to better understand and address the overrepresentation of BIPOC individuals among those experiencing homelessness. CoC and ESG funded programs are highly encouraged to analyze racial and ethnic data within their delivery of homeless supportive services and compare it to regional Point in Time Count and US Census Bureau data. Instances of identified racial inequities should be reported to the CoC in a timely manner. Coordinated Entry Systems (CES) are required to evaluate often and routinely if their assessment tools, prioritization processes, and general practices within the CES exacerbate and create racial inequities in the housing and services needs of clients and do not prioritize clients for appropriate housing in a racially equitable way.

### **Prohibition Against Involuntary Family Separation**

According to the [Equal Access to Housing Final Rule](#), a Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. This means that any group of people that presents together for assistance and identifies themselves as a family is considered to be a family and must be served together as such if they meet other program eligibility requirements.

Furthermore, any subrecipient receiving funds under the ESG or CoC Programs, including faith-based organizations, cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. Projects that serve families with children must serve all types of families with children. If a project targets a specific population (e.g., women with children), these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults that reside together.

Additionally, [24 CFR Section 578.93 \(e\)](#) states that the age and gender of a child under age 18 must not be used as a basis for denying any family's admission to any housing or shelter receiving ESG funding. Section 404 of the [McKinney-Veto Act](#) also reinforces this sentiment by clarifying, especially for projects where the current policy is to deny the admittance of boys under the age of 18, that denying admittance to a project based on age and gender is no longer permissible. HUD encourages Continuums of Care to use their centralized or coordinated assessment systems to find appropriate shelter or housing for families with male children under the age of 18.

### **Violence Against Women Act (VAWA)**

The Violence Against Women Act (VAWA) is a federal law that, in part, provides housing protections for people applying for or living in units subsidized by the federal government and who have experienced domestic violence, dating violence, sexual assault, or stalking, to help keep them safe and reduce their likelihood of experiencing homelessness.

Program participants cannot be denied assistance, have their assistance terminated, or be evicted from their housing solely because they are a victim of domestic violence. Participants cannot be denied admission to or removed from an emergency shelter on the basis or as a direct result of the fact that the applicant/participant is or has been a victim of domestic violence if they would otherwise qualify for admission or occupancy.

Providers that determine eligibility for or administer rental assistance are responsible for providing the



following two forms to each applicant and each participant receiving rental assistance.

- Notice of Occupancy Rights under the Violence Against Women Act ([Form HUD5380](#))
- Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternative Documentation ([Form HUD-5382](#))

These forms must be provided at each of the following times:

- When an applicant is denied ESG rental assistance
- When an applicant's application for a unit receiving project-based rental assistance is denied
- When a participant begins receiving ESG rental assistance
- When a participant is notified of termination of ESG rental assistance
- When a participant receives notification of eviction

### **Bifurcation**

When a family receiving tenant-based rental assistance separates under the lease bifurcation clause of [24 CFR 5.2009\(a\)](#), the family's tenant-based rental assistance and utility assistance, if any, shall continue for the family member(s) who are not evicted or removed. If a family living in a unit receiving project-based rental assistance separates under the lease bifurcation clause of [24 CFR 5.2009\(a\)](#), the family member(s) who are not evicted or removed can remain in the assisted unit without interruption to the rental assistance or utility assistance provided for the unit.

### **Lease Language**

Providers are required to ensure that the requirements listed under [24 CFR Part 5, Subpart L](#), are included or incorporated into all leases and rental assistance agreements for units that receive short-term or medium-term rental assistance. Under most circumstances, providers will need to provide and require a lease amendment including the necessary language. Providers may choose between the following two options for VAWA lease amendments:

- Providers may use the sample Lease Addendum ([HUD 91067](#))
- Providers may create their own lease addendum, which must incorporate all protections listed in [24 CFR Part 5, Subpart L](#)

Providers will need to incorporate the necessary language into all rental assistance agreements.

### **Emergency Transfer Plan for Survivors of Domestic Violence**

Projects serving individuals or families that qualify under Category 4, persons fleeing or attempting to flee violent situations, of the Defining "Homeless" Rule must follow all related federal and state laws. In addition, projects must follow confidentiality policies and must establish written policies and procedures regarding the provision of specific services to meet the safety and special needs of this subpopulation. CoC promotes the safety of tenants by establishing an Emergency Transfer Plan (ETP) Policy and Protocol to guide the housing relocation process for tenants who are at imminent risk of harm if they remain in their current housing unit.

The CoC ETP is designed to comply with the Violence Against Women Act (VAWA) and work cooperatively with other components of the region-wide system. Requests for emergency transfer are available regardless of sex, gender identity, or sexual orientation. The ability of a provider to honor such request for tenants currently receiving assistance may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether provider has another dwelling unit that is available and is safe to offer the tenant for

temporary or more permanent occupancy.

Participants who are victims of domestic violence qualify for an emergency transfer under an ETP if:

- They expressly request the transfer; and
- Either of the following is true:
  - They believe there is a threat of imminent harm from further violence if they remain within their existing unit; or,
  - *Only if they are a victim of sexual assault:* if the sexual assault occurred on the premises of their existing unit within the 90-calendar-day period preceding the participant's transfer request.

### **Coordinated Entry Participation**

Coordinated Entry (CE) is a CoC-wide process developed to ensure that individuals experiencing homelessness have fair and equal access to all resources designated for homeless individuals and families. This ensures households experiencing homelessness receive support and are quickly identified, assessed, referred to, and connected to housing and assistance based on their assessed need. The Coordinated Entry System (CES), process helps to prioritize assistance based on vulnerability and the severity of service needs. This ensures that people who need assistance the most can receive it in a timely manner. In doing so, CES ensures system coordination among emergency shelters, essential service providers, homelessness prevention providers, rapid re-housing providers, other homeless assistance providers, and mainstream service and housing providers.

To help ensure homeless households receive immediate housing and minimize barriers to housing access, all CoC and ESG subrecipients will be required to enter and/or receive referrals through the CES, with the exception of victim service providers. A victim service provider may choose not to utilize the CoC's CES process, if their organization is within a jurisdiction that uses a separate CES process that meets HUD's requirements. CoC and ESG funded housing projects must only take referrals from the CE lead. CE participation requires compliance with all established procedures and the use of the CE Assessment Tool and Vulnerability Index (VI). Projects should refer to the Coordinated Entry Policy and Procedure for additional information.

### **Data Collection – Homeless Management Information System (HMIS)**

A Homeless Management Information System (HMIS) is a database used to collect client-level data and services provided to individuals and families experiencing homelessness and persons at risk of homelessness. All ESG-funded and CoC-funded programs are required to enter clients in the Homeless Management Information System (HMIS) database at first contact. Only programs that are specifically forbidden by other statutes or regulations (e.g., domestic violence victim service providers) may not participate. The CoC actively encourages all non-CoC/ESG providers to participate in HMIS. All HMIS participating agencies should meet the minimum data quality standards and follow the HMIS Policies and Procedural Manual. All HMIS-participating agencies must collect and maintain common data fields as determined by the HMIS Administrator and HMIS Committee, considering all relevant regulations. This helps to ensure coordination between service providers through the Coordinated Entry System (CES) while avoiding duplication of services and client data and provides an opportunity to document homelessness.



## Coordination of Benefits with Mainstream Resources & Other Targeted Homeless Services

The CoC expects that every agency that is funded through the CoC or ESG programs will coordinate with and access mainstream and other targeted homeless resources to the maximum extent practicable. ESG funded programs must assist each program participant, as needed, to obtain other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, such as but not limited to: Medi-Cal, CalFresh, CalWORKs, Women, Infants and Children (WIC), Unemployment Insurance Program, Social Security Disability Insurance (SSDI)/Supplemental Security Income (SSI), Public housing programs, Temporary Assistance for Needy Families (TANF), and Services funded under the Workforce Investment Act.

Where possible, providers should streamline processes that include applying for mainstream benefits, such as the use of a singular form to apply for benefits or collecting all necessary information in one step. The SSI/SSDI Outreach Access and Recovery (SOAR) process is encouraged to speed up the SSI/SSDI process.

Additional programs and services include:

- Continuum of Care Program ([24 CFR 578](#))
- HUD-Veterans Affairs Supportive Housing ([HUD-VASH](#)) (Division K, Title II, Consolidated)
- [Consolidated Appropriations Act, 2008](#), Public Law 110–161 (2007), 73 FR 25026 (May 6, 2008)
- [Education for Homeless Children and Youth](#) - Grants for State and Local Activities (Title VII–B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.))
- Grants for the Benefit of Homeless Individuals ([Section 506 of the Public Health Services Act](#) (42 U.S.C. 290aa– 5))
- Grants for Community Health Services ([42 CFR Part 51c](#))
- Emergency Food and Shelter Program National Board (Title III of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11331 et seq.](#)))
- Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (Section 40299 of the [Violent Crime Control and Law Enforcement Act](#) (42 U.S.C. 13975)) Homeless Veterans Reintegration Program (section 5(a)(1)) of the [Homeless Veterans Comprehensive Assistance Act](#) (38 U.S.C. 2021)
- Domiciliary Care for Homeless Veterans Program ([38 U.S.C. 2043](#)) VA Homeless Providers Grant and Per Diem Program ([38 CFR Part 61](#)) Health Care for Homeless Veterans Program ([38 U.S.C. 2031](#)) Homeless Veterans Dental Program ([38 U.S.C. 2062](#)) Supportive Services for Veteran Families Program ([38 CFR Part 62](#)) Veteran Justice Outreach Initiative ([38 U.S.C. 2031](#))

## Confidentiality of Records

All ESG funded programs must develop and implement written procedures to ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- The address or location of any housing of a [program participant](#) will not be made public, except as

provided under a preexisting privacy policy of the [recipient](#) or [subrecipient](#) and consistent with [state](#) and local laws regarding privacy and obligations of confidentiality.

The confidentiality procedures must be in writing and must be maintained in accordance with [24 CFR 576.500\(x\)](#).

Providers are required to redact all personally identifying information (PII) on all documents submitted to their grantors unless their grantor explicitly requests and unredacted document. This includes but is not limited to documents submitted as part of the monitoring process, including client files. “Redacted” means that PII has been permanently erased, covered, or removed such that it cannot be retrieved by anyone in possession of the document. This is often accomplished by using correction fluid, correction tape, or an opaque black marker. Note that when using an opaque black marker, a single layer is often not sufficient to completely redact a file. Instead, a file should be redacted using an opaque black marker, scanned, printed, and redacted a second time; the second redaction should permanently remove all redacted PII.

### **Duplication of Benefits**

A duplication of benefits (DOB) occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose within the same time period, and the total assistance received for that purpose is more than the total need for assistance. A DOB review is required as it ensures that for all disaster recovery assistance received or expected by an applicant, there would be no waste of government resources through the receipt of excess benefits. The [Robert T. Stafford Disaster Assistance and Emergency Relief Act \(Stafford Act\)](#) prohibits any person, business concern or other entity from receiving recovery funds if financial assistance has already been provided for the same purpose(s). Programs must use the [Duplication of Benefits Checklist](#) for each participant that is provided ESG services.

### **Educational Liaison & Early Childhood Services**

For projects that serve households with children, a staff person must be designated as the educational liaison that will ensure children are enrolled in school and connected to appropriate services in the community, including early childhood projects such as Head Start.

### **Inclusion of Individuals with Lived Experience**

Projects need to provide opportunities for people who have lived experience of homelessness to provide expert advice and opinions on policy, procedures, and service delivery. Projects are expected to engage participants in ongoing program evaluation, solicit feedback on program service quality, and make improvements based on input.

The CoC Program requires that each recipient and subrecipient involve, to the maximum extent practicable, persons experiencing homelessness through employment, volunteer services, or otherwise the constructing, rehabilitating, maintaining, operating, and the providing of services for CoC projects. Additionally, each CoC and ESG funded organization must have lived experience participation and representation on a governing or decision-making body within the organization as well as promote the hiring of people with lived experience.

CoC and ESG funded programs are strongly encouraged to appropriately compensate participation of persons with lived experience for their expertise in project design, implementation, and decision-making processes. ESG administrative funds or CoC planning resources may be used to compensate people with lived experience for their time working on CoC planning activities. ESG administrative funds may also be used to pay personnel costs for subrecipient staff to provide administrative support and training for persons with lived experience who are participating in planning processes. All programs are encouraged

to seek out private funding to support appropriate compensation for persons with lived experience.

### Faith-based Activities

As detailed by [24 CFR 576.406](#) and [24 CFR 5.109](#), the minimum standards required for faith-based providers are:

- Providers receiving funding through ESG or CoC programs may not engage in inherently religious activities as part of these funded activities. Such activities must be offered separately from the ESG or CoC-funded projects and all participation must be voluntary.
- All religious organizations receiving ESG or CoC funding shall retain their independence from the government and may continue with their missions, provided that ESG or CoC funds are not used to support inherently religious activities.
- Religious organizations shall also maintain authority over their internal governance.
- No organization receiving ESG or CoC funds may discriminate against a participant based on religion or religious beliefs.
- ESG and CoC funds may be used for the rehabilitation of structures that are used for eligible activities under the program but may not be used to rehabilitate structures used specifically for religious activities.

### Environmental Review

All ESG activities are subject to an environmental review under HUD's environmental regulations detailed within [24 CFR Part 58](#). The subrecipient, or any contractor of the subrecipient, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for an ESG project, or commit or expend HUD or local funds for ESG eligible activities, until an environmental review under [24 CFR Part 58](#) has been performed and the recipient has received HUD approval of the property.

### Lead-Based Paint

All HUD-funded programs with housing programs occupied by program participants are required to incorporate lead-based paint remediation and disclosure requirements. Generally, these provisions require Programs to screen for, disclose the existence of, and take reasonable precautions regarding the presence of lead-based paint in leased or assisted units constructed prior to 1978.

ESG programs must document that the following items were given using the worksheet provided below:

- A Landlord/Tenant [Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards](#) document is required to be given to all clients for all units constructed prior to 1978.
- The pamphlet "[Protect Your Family From Lead in Your Home](#)" is required to be given to clients for all units constructed prior to 1978.
- Utilize the [ESG Lead Screening Worksheet](#) to conduct a lead-based paint visual assessment.

### Monitoring Performance

CoC is responsible for monitoring project level and system level performance annually or biennially. The CoC will consult with recipients and subrecipients annually to establish performance targets appropriate for the population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action to improve performance. Findings may stem from but are not limited to evidence of unwillingness to accept technical assistance, a history of inadequate financial accounting

practices, indications of project mismanagement, a drastic reduction in the population served, program changes made without prior CoC approval, or loss of a project site.

### **Termination & Grievance Procedures**

If a program participant violates program requirements (i.e., fails to meet with a case manager on a monthly basis) or no longer meets minimum eligibility requirements for program assistance (i.e., income change), the subrecipient may terminate assistance to the participant. Termination does not bar the subrecipient from providing further assistance at a later date to the same family or individual. To terminate assistance, providers must have a written termination policy outlining program rules and termination processes including a formal grievance process. This process, at minimum, must consist of:

1. Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
2. Written notice to the program participant containing a clear statement of the reasons for termination;
3. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person who made or approved the termination decision or a subordinate of that individual; and
4. Prompt written notice of the final decision to the program participant.

### **Record Keeping Requirements for All Projects**

Subrecipients must establish and follow written intake procedures to ensure compliance with HUD's definition of homelessness and recordkeeping requirements.

All records pertaining to each fiscal year of ESG funds must be retained in compliance with [24 CFR 576.500](#) for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

- Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served;
- Where ESG funds are used for the renovation of an emergency shelter involves costs charged to the ESG grant that exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation; and
- Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

Subrecipients and its subrecipients must retain supporting documentation for all costs charged to the ESG grant.

Subrecipients and its Sub-subrecipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under [24 CFR 576.101](#) through [576.109](#), financial management in [2 CFR 200.302](#), and the cost principles in [2 CFR Part 200, Subpart E](#).

### **Annual Income**

For each program participant who receives Homelessness Prevention assistance, or who receives Rapid Re-Housing assistance longer than one year, the following documentation of annual income must be maintained:

- Income evaluation form containing the minimum requirements specified by HUD and completed by the client or provider; and
- Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement);
- To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
- To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

### Service Payments

The program is expected to maintain payment receipts and backup documentation of services and assistance provided to the participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant.

Participant Recordkeeping Requirements include:

- All records containing personally identifying information (PII) must be kept secure and confidential. When sharing files with outside agencies, the provider must redact all client PII.
- Programs must have a written confidentiality/privacy notice. This notice must be provided to the participant if requested.
- Documentation of homelessness (following HUD guidelines). Evidence of homeless status shall be prioritized by third-party documentation first, intake worker observations second, and a certification from the person seeking assistance third.
- A record of services and assistance provided to each participant.
- Documentation of any applicable requirements for providing services/assistance.
- Documentation of use of the coordinated assessment system.
- Documentation of use of HMIS.
- Records must be retained for the appropriate amount of time as prescribed by HUD.

Client File Recordkeeping Requirements include:

- The client's full name.
- The full numeration of the clients Social Security Number; if applicable.
- The Intake Form or Program Enrollment Form for each service provided at the time of intake.

- The Coordinated Entry enrollment for the client or referral of the client to the Community Queue within HMIS
- The VI-SPDAT Assessment signed and dated by the client for each entry to homelessness.
- A Release of Information (ROI) Form that is/was active during the period of program enrollment or intake and that is signed and dated by the client and/or relevant staff.
- Verification of homelessness. Evidence of homeless status shall be prioritized by third-party documentation first, intake worker observations second, and a certification from the person seeking assistance third. ([Sample 1](#) & [Sample 2](#))
- Case Notes
- Housing Stability Plan
- Verification of Income ([Sample: Pages 11-15](#))
- Duplication of Benefits Analysis ([Sample](#))
- Rental Lease signed and dated by both the client and landlord and includes required VAWA language. ([Sample HUD 91067](#))
- Housing Habitability Inspection ([Sample: Pages 4-5](#))
- Lead Based Paint Screening Certification ([Sample](#))
- Lead Hazard Information and Documentation Kept by Landlords
- Utility Statements
- Rent Reasonableness ([Sample](#))
- Verification of Service Payments
- W-9 for Landlord ([IRS W-9](#))
- Ineligibility determinations with documentation of the reason; if applicable

Financial Recordkeeping Requirements include:

- Documentation for all costs charged to the grant.
- Documentation that funds were spent on allowable costs.
- Documentation of the receipt and use of program income.
- Documentation of compliance with expenditure limits and deadlines.
- Retain copies of all procurement contracts as applicable.
- Documentation of amount, source, and use of resources for each match contribution.

### **Permanent Supportive Housing (PSH) and Safe Haven**

Permanent Supportive Housing (PSH) is permanent housing with indefinite leasing or rental assistance

paired with supportive services to assist persons experiencing homelessness that have a disability or families with an adult or child member with a disability to achieve housing stability.

### Eligibility Criteria

- Households must meet the HUD definition of homelessness.
- One adult or child member of the household must have a disability.
- CoC funded programs must follow any additional eligibility criteria set forth within the Notice of Funding Availability (NOFA) through which the project was funded and the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by the funding agencies.

### Prioritization

All CoC funded PSH programs are required to commit to be either Dedicated or [DedicatedPlus](#) for housing individuals that are chronically homeless. Regardless of whether a PSH program is classified as Dedicated or DedicatedPlus, the order of priority will follow the HUD Notice on [Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#). All CoC funded PSH programs are required to take clients from a single prioritized list based on the CoC Coordinated Entry Policy and Procedure Manual.

- First priority will be given to individuals or families who meet the definition of chronically homeless. See Appendix A.

When there is no individual or family identified on the priority list that meets the definition of chronically homeless, then the order of priority will proceed as follows:

- Individuals and families experiencing homelessness with a disability and with at least 12 months of time experiencing homelessness, but do not meet the definition of chronically homeless and identified as having severe service needs.
- Individuals and families experiencing homelessness with a disability with severe service needs.
- Individuals and families experiencing homelessness with a disability coming from places not meant for human habitation, safe haven, or emergency shelter without severe service needs.
- Individuals and families experiencing homelessness with a disability that came from Transitional Housing.

### Minimum Standards of Assistance

- There can be no predetermined length of stay for a PSH project.
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of their stay within PSH.

- Project participants in PSH must enter a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- PSH programs must utilize housing first approaches.

### HUD Performance Benchmark

- 80% of participants remain or are exited to permanent housing in non-chronically homeless (non-CH) dedicated programs.

### Performance Goals

- 95% annual occupancy/utilization rate.
- 90% of participants remain or are exited to permanent housing in non-CH dedicated programs.
- 85% of participants remain or are exited to permanent housing in CH dedicated programs.
- 20% of adult participants maintain, gain, or increased earned income at the end of the report year.
- 80% of adult participants have income other than employment at the end of the report year.
- Clients are housed within 45 days from the date of referral.
- At least 85% of households that exit a rapid re-housing program to permanent housing should not become homeless again within one year.

### Rapid Re-Housing (RRH)

Rapid re-housing is an intervention designed to help individuals and families exit homelessness quickly by returning to permanent housing without preconditions (including, but not limited to, sobriety, employment, absence of a criminal record, or income). Additionally, the resources and services provided are tailored to the unique needs of the household receiving assistance.

There are three core components that constitute a rapid re-housing program, all of which must be available to qualify as a rapid re-housing program. Although RRH programs must have each of the three components available, it is not required that a single entity provides all three services.

Similarly, it is also not required that any one household utilizes all three to be considered a recipient of rapid re-housing.

Rapid re-housing’s core components include the following: Housing Identification, Rent/Move-In Assistance (Financial) and Rapid Re-Housing Case Management and Services. Actions constituting these components are described in Table 1.

**Table 1: Rapid Re-Housing Core Components**

<b><i>Housing Identification</i></b>	<ul style="list-style-type: none"> <li>• Recruit landlords to provide housing opportunities for individuals and families experiencing homelessness.</li> <li>• Address potential barriers to landlord participation such as concern about short term nature of rental assistance and tenant qualifications.</li> <li>• Assist households to find and secure appropriate rental housing.</li> </ul>
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<p><b><i>Rent / Move-In Assistance</i></b></p>	<ul style="list-style-type: none"> <li>• Provide assistance to cover move-in costs, deposits, and the rental and/or utility assistance (typically six months or less) necessary to allow individuals and families to move immediately out of homelessness and to stabilize in permanent housing.</li> </ul>
<p><b><i>Rapid Re-Housing Case Management and Services</i></b></p>	<ul style="list-style-type: none"> <li>• Help individuals and families experiencing homelessness identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.</li> <li>• Help individuals and families experiencing homelessness address issues that may impede access to housing (such as credit history, arrears, and legal issues).</li> <li>• Help individuals and families negotiate manageable and appropriate lease agreements with landlords.</li> <li>• Make appropriate and time-limited services and support available to families and individuals to allow them to stabilize quickly in permanent housing.</li> <li>• Monitor participants' housing stability and maintaining availability to resolve crises, at a minimum during the time rapid re-housing assistance is provided.</li> <li>• Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources related to benefits, employment, and community-based services (if needed/appropriate) so that they can sustain rent payments independently when rental assistance ends.</li> <li>• Ensure that services provided are client-directed, respectful of an individuals' right to self-determination, and voluntary. Unless basic, program-related case management is required by statute or regulation, participation in these services should not be required to receive rapid re-housing assistance.</li> </ul>

### Eligibility Criteria

- Households must meet the HUD definition of homelessness.
- CoC funded programs must follow any additional eligibility criteria set forth within the Notice of Funding Availability (NOFA) through which a project was funded as well as the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by the project's funding sources.
- For ESG and CoC funded programs, the participant's household annual income should meet program income limits at enrollment and at annual re-evaluation.

### Prioritization

Eligible participants are referred to the rapid re-housing program based on the following priorities:

- Households with the longest history of homelessness.

- Households with the most severe service needs.
- Households who are currently living in a place not meant for human habitation or emergency shelter.

All rapid re-housing programs will strictly take referrals from a single priority list communicated by the Coordinated Entry Lead administrator and follow the Coordinated Entry Policy and Procedure.

Note: For ESG funded projects, the project has to prioritize participants who are residents of the ESG consortium.

### Lease Agreements

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

For program participants living in housing with project-based rental assistance under [24 CFR Section 576.106 \(j\)](#), the lease must have an initial term of 1 year. Each lease executed on or after *December 16, 2016* must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under [24 CFR part 5, subpart L](#) (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by [24 CFR 576.409](#), including the prohibited bases for eviction and restrictions on construing lease terms under [24 CFR 5.2005\(b\)](#) and [\(c\)](#). If the housing is not assisted under another "covered housing program," as defined in [24 CFR 5.2003](#), the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

### Rent Limits for Rapid Re-Housing Program

- Financial assistance is available for a maximum of 24 months. It is recommended to evaluate each individual's case monthly to determine the length and percentage of financial assistance needed.
- Typically, at the beginning of assistance, the RRH program will pay 100% of rent or utility costs. The participant's responsibility for rent/utility payment should be reviewed, determined, and explained to the participant by the RRH program. The participant's responsibility will gradually increase to 100% within a determined timeframe.
- A household can only be eligible for RRH programs located within the CoC geographic area for no more than 2 instances within the past 3 years. The total rental assistance period must not exceed 24 months. The total amount of assistance provided must not exceed \$10,000.

### Fair Market Rent

Household rent for participants receiving ESG-funded rental assistance must not exceed the Fair Market Rent (FMR) established by HUD. FMR requirements do not apply when a program participant receives only financial assistance or services under HUD's Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of "last month's

rent,” utility payments/deposits, and/or moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

### Rent Reasonableness

For participants receiving rental assistance, household rent must comply with HUD’s standard of rent reasonableness meaning that the rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be more than rents currently being charged by the owner for comparable unassisted units. These rent restrictions are intended to help ensure that program participants can remain in their housing after their assistance ends. The [Rent Reasonableness Checklist and Certification](#) form must be used to ensure this guideline has been met. As with FMR, rent reasonableness requirements do not apply when a program participant receives only financial assistance or services under HUD’s ESG Housing Stabilization and Relocation Services.

Rental assistance will only be provided through the ESG program if the total rent for the unit does not exceed the FMR established by HUD and complies with HUD’s standard of rent reasonableness, unless a waiver is in effect allowing for rents to exceed FMR.

### Minimum Standards of Assistance

- The maximum period of participation within a rapid re-housing program cannot exceed 24 months.
- Supportive services must be provided to participants throughout the duration of their stay in housing. Program participants are required to meet with a case manager at minimum once per month to assist the participant with ensuring long-term housing stability.
- CoC funded program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for a term length that is a minimum of one month long, except with prior notice from either party.
- To continue to receive ESG and CoC RRH assistance, a program participant’s reevaluation must demonstrate eligibility based on:
  1. Lack of sufficient resources and support networks to retain housing without the program assistance.
  2. The ESG or CoC funded program must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing at a minimum of 3-month intervals, but preferably monthly.
- RRH programs must utilize Housing First approaches.

### HUD Benchmarks

- Households served by a rapid re-housing program must move participants into permanent housing within an average of 30 days or fewer from program entry.
- At least 80% of households that exit a rapid re-housing program must exit into permanent housing.
- At least 85% of households that exit a rapid re-housing program to permanent housing should not become homeless again within one year.

## Performance Goals

- 95% annual occupancy/utilization rate.
- 30% of adult participants maintain, gain, or increase their earned income at the end of the report year.
- 80% of adult participants have income other than employment at the end of the report year.

## Transitional Housing

Transitional Housing (TH) is designed to provide individuals and families experiencing homelessness with interim support and stability to successfully move into and maintain permanent housing.

## Eligibility Criteria

- Households must meet the HUD [definition of homelessness](#).
- CoC funded programs must follow any additional eligibility criteria set forth in the Notice of Funding Availability (NOFA) through which the project was funded as well as the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funding sources.

## Prioritization

Eligible participants are referred to the transitional housing program based on the following priorities:

- Households with the longest history of homelessness.
- Households with the most severe service needs.
- Households who are currently living in places not meant for human habitation or emergency shelter.

All CoC funded Transitional Housing programs will strictly take referrals from a single priority list from the Coordinated Entry Lead administrator and follow the Coordinated Entry Policy and Procedure.

## Minimum Standards of Assistance

- The participant's maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be provided throughout the duration of the stay in transitional housing. Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month that ends within 24 months and that cannot be extended.

## Performance Goals

- 90% annual occupancy/utilization rate.
- 90% of participants remain or are exited into permanent housing.
- For youth only programs, 90% of participants are exited into safe housing.
- 20% of adult participants gain or increase earned income at the end of the report year.

- At least 85% of households that exit a TH program into permanent housing should not become homeless again within one year.

### **Joint Transitional Housing and Rapid Re-Housing Component Projects**

Joint Transitional Housing and Rapid Re-Housing Component projects (Joint Projects) provide transitional housing with the availability of financial assistance and supportive services through rapid re-housing to support housing placement and stabilization as needed. Joint Projects incorporate both the Transitional Housing and Rapid Re-Housing standards.

### **Emergency Shelter**

Emergency shelters are facilities in which the primary purpose is to provide temporary shelter for individuals experiencing homelessness and do not require the occupant to sign a lease or occupancy agreement. Emergency shelters serve an essential role in providing service rich environments to engage individuals experiencing homelessness with the appropriate resources to obtain permanent housing.

### **Eligibility Criteria**

- Households must meet the definition of HUD’s homelessness.
- There are no requirements related to ID, income, or employment.
- Providers operating single sex projects are required to provide all individuals, including transgender individuals and other individuals who do not identify with the sex they were assigned at birth, with access to programs, benefits, services, and accommodations in accordance with their gender identity without being subjected to intrusive questioning or being asked to provide documentation.
- CoC funded programs must follow any additional eligibility criteria set forth within the Notice of Funding Availability (NOFA) through which a project was funded as well as the grant agreement.
- Programs may not establish additional eligibility requirements beyond those specified here and those required by the project’s funding sources.

### **Diversion and Referral**

Providers should screen those presenting for shelter for possible diversion. When appropriate based on the client’s needs and wishes, the provision of or referral to Homelessness Prevention services that can quickly assist the client to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter or Transitional Housing services. Further, providers should ensure expedited linkage to these services for critical cases.

### **Discharge**

Program participants shall be discharged from Emergency Shelter services when they choose to leave, when they have successfully obtained safe, permanent housing, or have violated program safety, conduct, or participation rules. Any Length of Stay limitations shall be determined by the individual service provider’s policies and clearly communicated to program participants. Providers should avoid setting arbitrary length of stay requirements, and instead focus on models that are flexible, client-centered, and Housing First-oriented.

### **Assessing, Prioritizing, and Reassessing Needs**

Providers are required to comply with the Merced CoC's assessment and prioritization requirements through the CES, including verifying and documenting eligibility. The provision of essential services and shelter must be available to shelter residents for at least the period during which funds are provided.

### **Performance Goals**

- The average length of stay is less than 35 days.
- 50% of participants exit with a successful housing outcome.

and/or

- 30% of participants exit to permanent housing.
- Less than 30% of participants exit to an unknown location.
- 60% of participants exit with or are linked to cash income.
- 60% of participants exit with or are linked to non-cash resources.

### **Housing Problem-Solving**

Providers must attempt to provide diversion services to all participants who request services at the time the participant initially requests services.

Providers must offer rapid exit services to all participants enrolled in the project who are not already receiving rapid exit services from another project or provider. The project should continue to attempt to provide rapid exit services to each participant until both project and participant mutually agree that the participant will no longer benefit from them.

### **Street Outreach**

Street outreach activities are designed to meet the immediate needs of people experiencing homelessness in unsheltered locations by connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Component services generally consist of engagement, case management, emergency and mental health services, and transportation.

### **Affirmative Outreach**

In compliance with [24 CFR Section 576.407](#), all CoC funded programs must make known that the use of facilities, assistance, and services are available to all participants on a nondiscriminatory basis. If the procedures any provider uses to make known the availability of facilities, assistance, and services is unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, then the provider must establish additional procedures that ensure that those persons are made aware of the facilities, assistance, and services. Providers must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Providers are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

### **Eligibility Criteria**

- Households must meet the HUD definition of homelessness.
- CoC funded programs must follow any additional eligibility criteria set forth within the Notice of Funding Availability (NOFA) through which a project was funded as well as the grant agreement.

- Programs may not establish additional eligibility requirements beyond those specified here and those required by the project’s funding sources.

### Performance Goals

- 50% or more of all participants exit to a permanent housing situation.
- 60% or more of adult participants have income from sources other than employment.
- 60% or more of all participants have mainstream (non-cash) benefits at exit from the program.

### Homelessness Prevention

In accordance with Title 24 of the Code of Federal Regulations (CFR) Part 576, the Merced City and County Continuum of Care CA-520 (Merced CoC) has developed the following written standards for Homelessness Prevention (HP) Programs. These standards will apply to all projects that receive Merced CoC Emergency Solutions Grants (ESG) funding for HP activities. In addition, HP projects that do not receive ESG funding that are within the Merced CoC geographical area are encouraged to apply these standards to their projects. The goal of these standards is to create key elements of the HUD regulations with the processes and priorities of the Merced CoC to ensure that HP projects are administered fairly and methodically.

Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in [§576.105](#), the short-term and medium-term rental assistance requirements in [§576.106](#), and the written standards and procedures established under [§576.400](#).

HP assistance includes housing relocation and stabilization services and/or short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “At risk of homelessness” definition in [§576.2](#). The costs of HP are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing.

### Eligibility Criteria

HP assistance may be provided to individuals and families who meet the criteria under the “At Risk of Homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in [§576.2](#), or lack the support networks to attain housing stability, and have an annual income that does not exceed thirty percent of the Area Median Income (AMI) for the family unit at intake and re-evaluation, as determined by the United States Department of Housing and Urban Development (HUD). In addition, to the above criteria, only individuals and families who will experience literal homelessness without HP assistance qualify for assistance.

### Evidence of Homeless Status

The recipient must have policies and procedures to ensure the requirements of this part are met, including requirements established by [2 CFR Part 200](#). The policies and procedures must be established in writing and implemented by the recipient and its subrecipients to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met.

ESG funded HP programs must adhere to the Recordkeeping and Reporting Requirements within [§576.500](#). See this regulation for acceptable forms of recordkeeping and report documentation and prioritization.

### Documentation

Program must document income verification using their program specific evaluation form and verification documentation. Prioritization order for documentation is described below:

### **Source Documents**

Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g. wage statement, unemployment compensation statement, public benefits statement, bank statement).

### **Third Party Verification**

A written statement by the relevant third party (e.g. employer, government benefits administrator, Written Third Party Verification of Income form) or the written certification by the subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available.

### **Self-Certification**

If source documents and third-party verification are unobtainable, a written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

### **Program Re-evaluation**

At a minimum, programs should re-evaluate program participant's eligibility, types and amounts of assistance, and the program participant needs, no less than every three months. To continue to receive assistance, a program participant's re-evaluation must demonstrate eligibility based on:

#### **Lack of Resources and Support Networks**

The program participant's household must continue to lack sufficient resources and support networks to retain housing without HP assistance.

#### **Income**

Re-evaluation must demonstrate that the program participant has an annual income that does not exceed 30% of AMI for the family unit at re-evaluation.

### **Prioritization**

HP programs should target households at greatest risk of homelessness and assist participants to increase household incomes during enrollment.

### **Eligible Activities**

#### **Rental Assistance**

Subject to the general conditions under [24 CFR 576.103](#) and [24 CFR 576.104](#), subrecipients may provide program participants with up to 24 months of tenant-based or project-based rental assistance during any 3-year period. Assistance may include any combination of short-term and medium-term rental assistance. Applicants can return for rental assistance if they have received less than 24 months of rent during any 3-year period on a case-by-case basis as a result of extenuating circumstances (e.g., illness, death, divorce).

In addition, program participants may receive funds for security deposits in an amount not to exceed 2 months of rent. Program participants receiving rental assistance may move to another unit or building and continue to receive rental assistance, if the program participant continues to meet the program requirements. Rental assistance cannot be provided to a program participant who is already receiving



rental assistance or living in a housing unit receiving rental assistance or operating assistance through other Federal, State, or local sources.

Program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and move to a different Continuum of Care geographic area if they move out of the assisted unit to protect their health and safety. See recordkeeping requirements to ensure proper documentation of imminent threat of harm.

### **Rental Arrears**

Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

### **Short-Term Rental Assistance**

Short-term rental assistance (up to 3 months) programs target families with low to moderate barriers to securing and retaining permanent housing. These families require minimal service intervention and limited financial assistance to secure and stabilize permanent housing.

### **Medium-Term Rental Assistance**

Medium-term rental assistance (4-24 months) programs target families who experience moderate to high barriers to securing and retaining housing. These families have multiple barriers to housing that require longer periods of time to resolve and may require more intensive service interventions.

### **Fair Market Rent**

Household rent for participants receiving ESG-funded rental assistance must not exceed the Fair Market Rent (FMR) established by HUD. FMR requirements do not apply when a program participant receives only financial assistance or services under HUD's Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of "last month's rent," utility payments/deposits, and/or moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

### **Rent Reasonableness**

For participants receiving rental assistance, household rent must comply with HUD's standard of rent reasonableness meaning that the rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be more than rents currently being charged by the owner for comparable unassisted units. These rent restrictions are intended to help ensure that program participants can remain in their housing after their assistance ends. The [Rent Reasonableness Checklist and Certification](#) form should be used to ensure this guideline has been met. As with FMR, rent reasonableness requirements do not apply when a program participant receives only financial assistance or services under HUD's ESG Housing Stabilization and Relocation Services.

Rental assistance will only be provided through the ESG program if the total rent for the unit does not exceed the FMR established by HUD and complies with HUD's standard of rent reasonableness, unless a waiver is in effect allowing for rents to exceed FMR.

## Habitability Standards

Housing for all ESG program participants receiving rental assistance must meet HUD minimum habitability standards for permanent housing. Subrecipients must document compliance with this standard by signing and completing a [Habitability Standards Checklist](#) before the participant signs the lease and before the subrecipient provides any ESG rental assistance or services specific to the unit. In addition, subrecipients must inspect all units at least annually to ensure that the units continue to meet habitability standards and document inspections.

## Lease Agreement

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. The program participant must be the tenant on a lease for a term of at least one year that is renewable and terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.

## Rental Assistance Agreement

ESG program may make rental assistance payments only to an owner with whom the program participant has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the program participant.

Each rental assistance agreement that is executed or renewed on or after *December 16, 2016* must include all protections that apply to tenants and applicants under [24 CFR Part 5, Subpart L](#), as supplemented by [§576.409](#), except for the emergency transfer plan requirements under [24 CFR 5.2005\(e\)](#) and [576.409\(d\)](#).

If the housing is not assisted under another “covered housing program”, as defined in [24 CFR 5.2003](#), the agreement may provide that the owner's obligations under [24 CFR Part 5, Subpart L](#) (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), expire at the end of the rental assistance period.

ESG programs must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. If any late payment penalties occur because of ESG program process, ESG program is solely responsible for paying late payment penalties that it incurs with non-ESG funds. All rent payments must directly go the owner/landlord.

## Case Management

HP program participants must meet with a case manager no less than once per month to assist the program participant in ensuring long-term housing stability.

Additional case management will be provided on a case-by-case basis based on demonstrated need. Case managers should help to develop a plan to assist the program participant in retaining permanent housing after the assistance ends, considering all relevant considerations, such as the program participant's current or expected income and expenses, other public or private assistance for which

the program participant will be eligible and likely to receive, and the relative affordability of available housing in the Merced CoC area.

Case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing.

### **Housing Relocation and Stabilization Services**

Case managers will assist each program participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical and mental health treatment, counseling, and other services essential for achieving independent living.

HP assistance includes housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless definition in [24 CFR 576](#).

Eligible Housing Relocation and Stabilization Services under the ESG program include rental application fees, security deposits, last month’s rent, utility deposits and payments, moving costs, housing search and placement services, housing stability case management, mediation, legal services, and credit repair ([24 CFR 576.105](#)). Eligible rental assistance includes short- and/or medium-term rental assistance as well as rental arrears ([24 CFR 576.106](#))

Subject to the general conditions under the HP component ([24 CFR 576.103](#)) ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

- Rental housing application fee that is charged by the owner to all applicants.
- Security deposit that is equal to no more than 2 months’ rent.
- If necessary to obtain housing, the last month’s rent may be paid at the time the owner is paid the security deposit and the first month’s rent.
  - This assistance must not exceed one month’s rent and must be included in calculating the program participant’s total rental assistance, which cannot exceed 24 months during any 3-year period.
- May pay no more than 24 months of utility payments per program participant, per service within any 3-year period, including up to 6 months of utility payments in arrears, per service.
  - A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
  - Eligible utility services are gas, electric, water, and sewage.
- Moving costs, such as truck rental or hiring a moving company.
  - This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving housing stabilization services and before the program participant moves into permanent housing.
  - Payment of temporary storage fees in arrears is not eligible.

### **Housing Search & Placement Services**

Assist program participants in locating, obtaining, and retaining suitable permanent housing, including:

- Housing search;
- Tenant counseling;
- Understanding leases;
- Arranging for utilities;
- Making moving arrangements;
- Assessment of housing barriers, needs and preferences;
- Development of an action plan for locating housing;
- Outreach to and negotiation with owners;
- Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness; and
- Assistance with submitting rental applications.

### **Housing Stability Case Management**

Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing by, for example:

- Conducting the initial VI-SPDAT assessment, including verifying and documenting eligibility through CES.
- Developing, securing, and coordinating services for other federal, state, and local benefits.
- Monitoring and evaluating program participant progress, providing information and referrals to other providers.
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.
- Conducting re-evaluations

When providing homelessness prevention or rapid re-housing assistance to a program participant, the provider must do the following. Providers are exempt from the requirement under the first bullet point of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits that recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services.

- Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and
- Develop a plan to assist the program participant to retain permanent housing after the assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

### **Mediation**

Mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

### **Legal Services**

Costs of resolving a legal problem that prohibits a program participant from obtaining or retaining permanent housing. Legal services or activities include client intake, preparation of cases for trial,

provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible.

Legal services are subject to the following provisions:

#### **Eligible Billing Arrangements**

ESG funds may be used only for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys. Costs may be based on:

- Hourly fees
- Fees based on the actual service performed (i.e. fee for service) but only if the cost would be less than the cost of hourly fees

#### **Ineligible Billing Arrangements**

Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements.

#### **Eligible Subject Matters**

- Landlord/tenant matters
- Child support
- Guardianship
- Paternity
- Emancipation
- Legal separation
- Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
- Appeal of veterans and public benefit claim denials
- Resolution of outstanding criminal warrants

#### **Ineligible Subject Matters**

Legal services related to immigration and citizenship matters or related to mortgages.

#### **Credit Repair**

Credit counseling and other services are necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems.

### **Minimum Standards for Permanent Housing**

When ESG funds are used for permanent housing under [24 CFR 576.105](#) or [576.106](#), the minimum standards in [24 CFR 5.703](#) apply, except that:

For the purposes of ESG funding, the HUD definition of permanent housing means the program participant's unit, systems equipment that directly services those units, items, and components within the primary and secondary means of egress from those units' doors to the public way, and common features related to the program participant's use of the building (e.g., the laundry room, community room, mail room). [24 CFR 5.703](#) "HUD Housing".

Housing inspections. For the first 30 days in which a program participant receives homelessness prevention assistance, the recipient or subrecipient may provide services under [24 CFR 576.105\(b\)](#) to help the

program participant remain in their unit without inspecting the unit to determine whether it meets the minimum standards identified in this paragraph (c), except that the recipient or subrecipient must still comply with the requirements under [24 CFR Part 35](#). Before otherwise using ESG funds under [24 CFR 576.105](#) or [576.106](#) to help a program participant remain in or move into specific housing, however, the recipient or subrecipient must inspect that housing to confirm that it meets the requirements in this section. In addition, recipient or subrecipient must inspect the housing at least once every 12 months during the period of assistance to confirm the housing continues to meet the minimum standards in this paragraph (c).

Correction of deficiencies. If an inspection reveals one or more deficiencies that prevent the housing from meeting the requirements in this section, ESG funds must not be used under [24 CFR 576.105](#) or [576.106](#) with respect to that housing unless the owner corrects the deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

Rental arrears. Housing for which rental arrears are paid is only subject to the requirements in this section, if a program participant is seeking to stay in that housing.

Additional standards. The recipient may also add standards that exceed these minimum standards.

Other exemptions from [24 CFR Part 5, Subpart G](#). The requirements in [24 CFR 5.703\(b\)\(2\)](#) and [\(d\)\(6\)](#) and [5.705](#) through [5.713](#) do not apply.

### **System Wide Performance**

A critical aspect of the McKinney-Vento Homeless Assistance Act (the “Act”) as amended, is a focus on viewing the local homeless response as one coordinated system of homeless assistance. This is opposed to the idea of homeless assistance programs and funding sources that operate independently from one another. To facilitate this perspective, the Act now requires communities to measure their performance as one coordinated system in addition to analyzing performance by specific projects or project types.

To this end, the Act established a set of criteria for HUD to use that requires all CoCs to report their system-level performance. The intent of the system performance measures is to encourage CoCs, in coordination with ESG program recipients, as well as all other homeless assistance stakeholders within the CoC, to regularly measure their progress in meeting the needs of people experiencing homelessness within their community and to report this progress to HUD.

Successful housing outcomes for emergency shelter participants could be:

- Permanent housing or transitional housing for formerly homeless persons.
- Living with family or friends as permanent tenure, owned, or rental by client with or without subsidy.
- Psychiatric facility.
- Substance abuse or detox facility.

The goals below should be reviewed and adjusted annually based on the previous year’s performance measures. See Table 2: System Performance Measures.

**Table 2: System Performance Measures**

<b>Measure 1:</b> <i>The Length of Time Persons Remain Homeless</i>	Persons in ES and SH	<35 days
	Persons in ES, Safe Haven, and TH	<68 days
<b>Measure 1b:</b> <i>The Length of Time Persons Remain Homeless Using “Approximate Date Homelessness Started”</i>	Persons in ES and SH	<74 days
	Persons in ES, Safe Haven, and TH	<107 days
<b>Measure 2a:</b> <i>The Extent to Which Persons Who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 6 to 12 Months</i>	Returns to SO, ES, SH, and TH	<6%
	Returns to SO, ES, SH, TH, and PH	<7%
<b>Measure 2b:</b> <i>The Extent to Which Persons Who Exit Homelessness to Permanent Housing Destinations Return to Homelessness Within 2 Years</i>	Returns to SO, ES, SH, and TH	<22%
	Returns to SO, ES, SH, TH, and PH	<22%
<b>Measure 3:</b> <i>The Number of Homeless Persons</i>	Change in PIT counts of sheltered and unsheltered persons	<962
	Change in counts of sheltered persons in HMIS	<4637
<b>Measure 4:</b> <i>Employment and Income Growth for Homeless Persons within CoC Funded Programs and Projects</i>	Increase in employment income for stayers	>6%
	Increase in non-employment cash income for stayers	>28%
	Increase in total cash income for stayers	>31%
	Increase in employment income for leavers	>11%
	Increase in non-employment income for leavers	>40%
	Increase in total cash income for leavers	>47%
<b>Measure 5:</b> <i>The Number of Persons Who Become Homeless for the First Time</i>	Persons experiencing homelessness for the first time within ES, SH, and TH	<3346
	Persons experiencing homelessness for the first time within ES, SH, TH, and PH	<3622
<b>Measure 6a:</b> <i>Successful Placement from Street Outreach</i>	Persons who exited Street Outreach	538
	Persons exited to temporary and some institutional destinations	35
	Persons exited to permanent housing destinations	200

	Percentage of successful exits	>44%
<b>Measure 6b: Successful Placement in or Retention of Permanent Housing</b>	Persons in ES, SH, TH, and RRH who exited	3942
	Persons exited to permanent housing destinations	1429
	Percentage of successful exits	>36%
	Persons in PH-H, PSH, and PH-S who exited	981
	Persons that remained in applicable PH projects and/or exit to permanent destinations	932
	Percentage of successful exits and retention	>95%



## Appendix A: Homeless and Chronically Homeless Definition

### Four Categories of the Homeless Definition

<p><b>Category 1</b> <i>Literally Homeless</i></p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ol style="list-style-type: none"> <li>1. Has a primary nighttime residence that is a public or private place not meant for human habitation; <b>or</b></li> <li>2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <b>or</b></li> <li>3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.</li> </ol>
<p><b>Category 2</b> <i>Imminent Risk of Homelessness</i></p>	<p>An individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ol style="list-style-type: none"> <li>1. Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>2. No subsequent residence has been identified; <i>and</i></li> <li>3. The individual or family lacks the resources or support networks needed to obtain other permanent housing.</li> </ol> <p>Note: Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.</p>
<p><b>Category 3</b> <i>Homeless Under Other Federal Statutes</i></p>	<p>Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ol style="list-style-type: none"> <li>1. Are defined as homeless under the other listed federal statutes;</li> <li>2. Have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>3. Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and</li> <li>4. Can be expected to continue in such status for an extended period of time due to special needs or barriers.</li> </ol>
<p><b>Category 4</b> <i>Fleeing / Attempting to Flee Domestic Violence</i></p>	<p>Any individual or family who:</p> <ol style="list-style-type: none"> <li>1. Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; <b>and</b></li> </ol>

- |  |  |
|--|--|
|  | <ol style="list-style-type: none"><li>2. Has no other residence; <b>and</b></li><li>3. Lacks the resources to obtain other safe permanent housing.</li></ol> |
|--|--|

### Chronically Homeless Definition

The definition of “chronically homeless”, as stated in the Defining Chronically Homeless Final Rule is:

A homeless individual with a disability, as defined in [Section 401 \(9\)](#) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility (including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility) if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility; and
- Lived as described above continuously for at least 12 months, or on at least 4 separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

The definition of “chronically homeless” families, as stated in the Defining Chronically Homeless Final Rule are:

- Families with adult heads of household who meet the definition of a chronically homeless individual as stated above. If there is no adult in the family, the family would still be considered chronically homeless if a minor head of household meets all the criteria of a chronically homeless individual. A chronically homeless family includes those whose composition has fluctuated while the head of household has been homeless.

## Appendix B: Homelessness Verification Requirements

### Homelessness Verification Documentation Recording Requirements:

<p style="text-align: center;"><b>Category 1</b> <i>Literally Homeless</i></p>	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; or</li> <li>• Written referral by another housing or service provider; or</li> <li>• Certification by the individual or head of household seeking assistance stating that they were living on the streets or in shelter;</li> <li>• For individuals exiting an institution - one of the forms of evidence above and:             <ul style="list-style-type: none"> <li>○ Discharge paperwork or written/oral referral; or</li> <li>○ Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution.</li> </ul> </li> </ul>
<p style="text-align: center;"><b>Category 2</b> <i>Imminent Risk of Homelessness</i></p>	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual or family that they must leave; or</li> <li>• For individuals and families leaving a hotel/motel - evidence that they lack the financial resources to stay; or</li> <li>• A documented and verified oral statement; and</li> <li>• Certification that no subsequent residence has been identified; and</li> <li>• Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing.</li> </ul>
<p style="text-align: center;"><b>Category 3</b> <i>Homeless Under Other Federal Statutes</i></p>	<ul style="list-style-type: none"> <li>• Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and</li> <li>• Certification of no PH in the last 60 days; and</li> <li>• Certification by the individual or head of household, and any available supporting documentation, that they have moved two or more times in the past 60 days; and</li> <li>• Documentation of special needs or 2 or more barriers</li> </ul>
<p style="text-align: center;"><b>Category 4</b> <i>Fleeing / Attempting to Flee Domestic Violence</i></p>	<p>For victim service providers:</p> <ul style="list-style-type: none"> <li>• An oral statement by the individual or head of household seeking assistance which states: they are fleeing and have no subsequent residence, and they lack resources. Statement must be documented by a self-certification by the intake worker.</li> </ul>

	<p>For non-victim service providers:</p> <ul style="list-style-type: none"><li>• Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and</li><li>• Self-certification, or other written documentation, that they individual or family lacks the financial resources and support networks to obtain other permanent housing.</li></ul>
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## Appendix C: Resources

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